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*Attorneys for Defendant Comenity Capital Bank*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MARIA CAGUICLA,

Plaintiff,

vs.

TRANS UNION, LLC; EXPERIAN  
INFORMATION SOLUTIONS, INC.;  
EQUIFAX INFORMATION SERVICES,  
LLC; and COMENITY BANK,

Defendants.

Case No: 2:24-CV-00055-ART-EJY

**JOINT UNOPPOSED MOTION TO  
EXTEND DEADLINE FOR  
DEFENDANT COMENITY CAPITAL  
BANK TO RESPOND TO  
COMPLAINT**

**[FIRST REQUEST]**

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule IA 6-1, Defendant Comenity Capital Bank ("Comenity") and Plaintiff Maria Caguicla ("Plaintiff"), by and through their respective counsel, request that the Court grant their Joint Unopposed Motion to Extend the Time for Comenity to answer or otherwise respond to Plaintiff's Complaint. In support of this Motion, the parties stipulate as follows:

1. The Complaint was served on Comenity on January 10, 2024.
2. Comenity's current deadline to respond to the Complaint was January 31, 2024.
3. Comenity hired new counsel, Joe Garin of Lipson Neilson, on February 5, 2024.
4. The parties met and conferred about the extension of time to respond to the Complaint and agreed that Comenity's deadline to respond to the Complaint shall be extended to March 1, 2024.

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1           5.       There have been no prior extensions of Comenity's deadline to respond to  
2 the Complaint.

3           6.       Accordingly, the parties respectfully and jointly request that the Court  
4 extend the deadline for Comenity to answer or otherwise respond to the Complaint to  
5 March 1, 2024.

6 DATED: February 14, 2024

LIPSON NEILSON P.C.

7  
8 By: 

Joseph P. Garin, Esq.  
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*Attorneys for Defendant  
Comenity Capital Bank*

12 DATED: February 14, 2024

FREEDOM LAW FIRM, LLC

16 By: /s/ Gerardo Avalos

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Las Vegas, NV 89123

*Attorney for Plaintiff Maria Caguicla*

22 **ORDER**

23 IT IS SO ORDERED.

24   
United States Magistrate Judge

26 Dated: February 14, 2024